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14 *Attorneys for Plaintiffs*
15 *Kunde Enterprises, Inc.*
16 *Vintage Wines Estates, Inc.*

17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION

20 KUNDE ENTERPRISES, INC.; VINTAGE
21 WINE ESTATES, INC.,

22 Plaintiffs,

23 v.

24 NATIONAL SURETY CORPORATION;
25 CERTAIN UNDERWRITERS AT LLOYD'S
26 LONDON; RSA INSURANCE GROUP;
27 LIBERTY SPECIALTY MARKETS
28 INSURANCE GROUP; NAVIGATORS
UNDERWRITING AGENCY LIMITED;
BRIT GLOBAL SPECIALTY; TRAVELERS
MARINE CARGO,

Defendants.

CASE NO. 4:19-cv-06636-JSW

**DECLARATION OF PAT RONEY IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANT NATIONAL SURETY
CORPORATION'S MOTION TO DROP
(DISMISS WITHOUT PREJUDICE) OR
SEVER PLAINTIFF VINTAGE WINE
ESTATES, INC. AND DEFENDANTS
CERTAIN UNDERWRITERS AT LLOYD'S
LONDON, RSA INSURANCE GROUP,
LIBERTY SPECIALTY MARKETS
INSURANCE GROUP, NAVIGATORS
UNDERWRITING AGENCY LIMITED,
BRIT GLOBAL SPECIALTY AND
TRAVELERS MARINE CARGO**

Judge: Hon. Jeffrey S. White
Date: December 20, 2019
Time: 9:00 A.M.
Courtroom: 5, 2nd Floor

1 I, Pat Roney, declare and certify to the Court as follows:

2 1. I have sufficient personal knowledge of the facts set forth herein that if called as a
 3 witness, I could and would testify competently to those facts under oath. In making this
 4 declaration, I expressly reserve all applicable privileges and protections.

5 2. I am the CEO and Founding Partner of Vintage Wine Estates, Inc. ("VWE").

6 3. Additionally, I serve as the President of Kunde Enterprises, Inc. ("Kunde"), and
 7 sit on Kunde's board of directors. In the course of my service on Kunde's board, I have taken
 8 part in, among other things, Kunde's insurance-related decisions.

9 4. In February 2010, I and VWE's other owner purchased a minority stake in Kunde.
 10 The purchase made VWE the managing partner of Kunde. The deal also permitted VWE and
 11 Kunde to pool resources in their winemaking ventures; for example, certain of VWE's wines are
 12 made at Kunde's estates.

13 5. Attached hereto as Exhibit A is a true and correct copy of a February 17, 2010
 14 article, entitled *Vintage Wine Estates takes minority stake in Kunde*, currently accessible at
 15 <https://www.northbaybusinessjournal.com/csp/mediapool/sites/NBBJ/IndustryNews/story.csp?cid=4174406&sid=778&fid=181>.

16 6. Attached hereto as Exhibit B is a true and correct copy of a February 17, 2010
 17 article, entitled *Santa Rosa group acquires interest in Kunde winery*, currently accessible at
 18 <https://www.pressdemocrat.com/news/2237984-181/santa-rosa-group-acquires-interest>.

19 7. Attached hereto as Exhibit C is a true and correct copy of an April 3, 2019 letter
 20 from RSA Insurance Group to Greg Skorheim, regarding VWE's insurance claims related to the
 21 October 2017 wildfires.

22 8. Attached hereto as Exhibit D is a true and correct copy of a March 14, 2019 letter
 23 from National Surety Corporation to Greg Skorheim, regarding Kunde's insurance claims related
 24 to the October 2017 wildfires.

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1 I declare under penalty of perjury that the foregoing is true and correct. This declaration
2 was executed on November 15, 2019 in Santa Rosa, California.

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Pat Roney